

# KING & SPALDING

King & Spalding LLP  
 1185 Avenue of the Americas, 35th Floor  
 New York, NY 10036-4003  
 Tel: +1 212 556 2100  
 Fax: +1 212 556 2222  
 www.kslaw.com

Leigh M. Nathanson  
 Partner  
 Direct Dial: +1 212 790 5359  
 lnathanson@kslaw.com

November 14, 2024

## VIA E-FILING

The Honorable John G. Koeltl  
 United States District Judge  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street, Courtroom 14A  
 New York, NY 10007-1312

**Re: *Leadenhall Capital Partners LLP et al. v. Wander et al.*, No. 1:24-cv-3453-JGK**

Dear Judge Koeltl:

We represent Plaintiffs Leadenhall Capital Partners and Leadenhall Life Insurance Linked Investments Fund PLC (“Leadenhall”) in the above-captioned action. On November 21, 2024, Leadenhall will respond to four separate motions to dismiss the complaint filed by Defendants on October 10, 2024. We write to notify the Court that Leadenhall intends to file a single, omnibus memorandum of law in opposition to the motions to dismiss, not to exceed 34,000 words. Defendants take no position on Leadenhall filing a single, omnibus opposition brief in response to their motions to dismiss.

On September 10, 2024, the Court so-ordered the parties’ stipulation providing for an expansion of word limits to their respective memoranda of law in connection with the motions to dismiss, permitting Defendants a total of 34,000 words for their opening briefs (10,000 words each for the 777 Entity Defendants<sup>1</sup> and Defendants Advantage Capital Holdings LLC/Kenneth King, and 7,000 words each for Defendants Josh Wander and Steven Pasko, who did not seek an expansion of the default word limits). ECF No. 193. Leadenhall was permitted a total of 34,000 words for its oppositions to Defendants’ motions. *Id.*

Defendants filed their motions to dismiss with four separate briefs on October 10, 2024. ECF Nos. 203–205, 209–215. Leadenhall intends to file a single, omnibus opposition brief responding to Defendants’ memoranda of law, not to exceed the limit of 34,000 words set by the Court’s prior order. ECF No. 193. Defendants have indicated that they take no position on

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<sup>1</sup> The 777 Entity Defendants are 777 Partners LLC, 600 Partners LLC, SPLCSS III LLC, Signal SML 4 LLC, Insurety Agency Services LLC, Dorchester Receivables II LLC, SuttonPark Capital LLC, Signal Medical Receivables LLC, Insurety Capital LLC, and SuttonPark Servicing LLC.

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Leadenhall filing a single opposition brief rather than four separate briefs responding to each motion. Given that Leadenhall does not intend to seek any further expansion of word limits, we do not believe that any modification of the Court's prior order is required but defer to the Court as to whether any further clarification of the parties' stipulation would be preferred.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Leigh M. Nathanson  
Leigh M. Nathanson

*Counsel for Plaintiffs*